

## PRIVACY POLICY

### *What is personal information?*

Personal information is information about an identifiable individual, including that which relates to his/her personal characteristics (eg. gender, age, income, home address or phone number, ethnic background, family status), his/her health (eg. health history, health conditions, health services received by them), or his/her activities or views (eg. religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information is not to be confused with business information (eg. an individual's business address and telephone number), which is not protected by PIPEDA, the Personal Information Protection and Electronic Documents Act, an act of the Federal government.

### *Our reasons for collecting your personal information.*

Like all professional associations, we collect, use and sometimes disclose personal information in order to serve our clients. For our clients, the primary purpose we collect and maintain personal information is to provide safe, appropriate and consistent treatment. This will include information such as health history, family medical history, social and occupational situations and physical condition related to function. This information will help us to formulate a professional opinion regarding ones health and their unique health needs, provide the client with options and help them receive the health care management of their choice.

Personal information is kept confidential and only staff members have access to this information without the explicit consent of the client in writing.

### *Are their other reasons you may have for collecting personal information?*

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The following examples apply:

- To provide clients with invoices regarding services rendered, goods provided, to process credit card payments and to settle outstanding accounts.
- To advise our clients of special events, ceremonies, opportunities or regarding new products and services available.
- Our client file information may be accessed for the purposes of internal or external audits. Internal audits will include things such as performance and quality assessment reviews. External audits will include things such as auditors, lawyers, practice consultants and voluntary accreditation programs in order to provide continuing improvement towards our products and services.
- In the event that a product or service offered, or previously offered, at our clinic should be reviewed for function and safety and appropriateness of use.
- Oftentimes, third party payers (OHIP, WSIB, private insurance, etc.) may request information to determine client entitlement to funding for services or products



received. This is available with your consent, or in some instances through direct legislative authority.

- The College of Chiropractors of Ontario regulates the practice of Chiropractic within Ontario and is in charge of protecting the safety of the public. It is their right to inspect our office, files and interview our staff in favor of the public interest.
- We reserve the right to report serious illegal behavior to the authorities.
- Various government agencies such as Canada Customs and Revenue Agency, Information and Privacy Commissioner, Human Rights Commissioner, etc. have the right to review our files and interview our staff.
- In the event that our clinic or its assets are sold a purchaser may wish to conduct a ‘due diligence’ review of the clinic’s record to ensure that the business has been honestly portrayed. Personal information is not allowed to be recorded or removed from the premises and a confidentiality agreement is signed by the purchaser. You may choose to eliminate yourself and file information from this process in writing.

### ***What about the transfer of information?***

File and personal information may be transferred upon request by the client, though we retain the right to charge a nominal fee. In this instance we will always keep the original copy of the file, and photocopies will be issued.

In the event that information is requested by authorized third parties (for example, an insurance company), only relevant information will be relayed and only with your express consent.

### ***How is information stored and how is it destroyed?***

Our files will be kept for a minimum of ten years after the last contact and file entry. Files will be kept in a secure location with restricted access on the business premises.

Retaining information for this period of time ensures that we can efficiently and accurately answer questions you have about care previously received and for our own accountability to external regulatory bodies.

Client contact directories will be systematically maintained and names and contact information removed when clients move, pass away, submit a written request to have their name removed from the contact directory or have any reason to believe that we will not be contacting you again.

Electronic information is removed by deleting the information from files or software/hardware. In addition, when the hardware is discarded we will ensure the physical destruction of the device.

Paper files and information is destroyed on the premises via shredding.

### ***Can other organizations look at my personal information?***

Various government agencies (Canada Revenue Agency, Information & Privacy Commissioner, Human Rights Commission, Ontario Ministry of Finance, Ontario Ministry of Labour, etc.) have the authority to review our files and interview our staff as part of their mandates. External regulators have their own strict privacy obligations.



***Can I look at my own file and records?***

You have the right to see what personal information we hold. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

We may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days, if at all possible, and explain the reasons.

If you believe there is a mistake in the personal information we maintain in our files, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have formed. We may ask you to provide documentation to support your request. Where we agree that we have made a mistake, we will make the correction and notify anyone to whom we have sent this information. If we do not agree that we have made a mistake, we will still agree to include in our records a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

***What if I have any questions that aren't answered here, or a complaint?***

Please feel free to ask any member of our staff if you have questions or concerns regarding our privacy policy.

If you wish to make a formal complaint about our privacy policies or practices, please do so in writing directed to the Privacy Information Officer/Clinic Director of this office, Dr. Robert Rodine.

For general enquiries and in the absence of any applicable provincial legislation, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as an Ombudsman for privacy disputes. The Information and Privacy Commissioner can be contacted at:

Privacy and Information Commissioner  
115 Kent Street, Ottawa, Ontario K1A 1H3  
613 995-8210 | 800 282-1376

